UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

UN	ITED STATES OF AMERICA,) INFORMATION	CR11-383	PAM
	Plaintiff,) (18 U.S.C. §	1349)	
	V.	,) \		
1.	DANIEL DOUGLAS BOLER, a/k/a Dan Boler, and)))		
2.	SUSANNE EILEEN MATHIS,))		
	Defendants.))		

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

(Conspiracy To Commit Mail and Wire Fraud)

From in or about 2005 through in or about 2008, in the State and District of Minnesota and elsewhere, the defendants,

DANIEL DOUGLAS BOLER, a/k/a Dan Boler, and SUSANNE EILEEN MATHIS,

did unlawfully and knowingly conspire, combine, confederate and agree with each other and with other individuals known and unknown to commit an offense against the United States, that is, to devise a scheme and artifice to defraud and to obtain money by means of material false and fraudulent representations and promises, and, for the purpose of executing such scheme, to transmit and cause to be transmitted by means of interstate wire certain writings, signs, signals, pictures, and sounds, and to send and deliver and cause to be sent and delivered by the United States Postal Service and interstate commercial carrier any matter and thing, all in violation of Title 18, United States Code, Section 1349.

SCANNEL	
DEC 2 3 2011	
U.S. DISTRICT COURT MPLS	

FILED DEC 2 3 2011
RICHARD D. SLETTEN
JUDGMENT ENTD
DEPUTY CLERK

FORFEITURE

If convicted of Count 1, alleging conspiracy to commit mail and wire fraud in violation of 18 U.S.C. § 1349, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any and all real and personal property constituting or derived, directly or indirectly, from proceeds of the offense charged in Count 1.

If any of the above-described property is unavailable for forfeiture as described in 21 U.S.C. § 853(p), the United States intends to seek the forfeiture of substitute assets pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 982(b) and 28 U.S.C. § 2461(c).

Dated: 12.23.2011

B. TODD JONES United States Attorney

BY: Tracy L. Perzel Assistant U.S. Attorney Attorney ID No. 296326